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for the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff Investment
Securities LLC and the Chapter 7 Estate of
Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

SQUARE ONE FUND LTD.,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04330 (CGM)

**CERTIFICATE OF NO OBJECTION TO TRUSTEE'S
MOTION FOR THE ISSUANCE OF A LETTER OF REQUEST**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the substantively consolidated chapter 7 estate of Bernard L. Madoff, by and through his undersigned counsel, submits this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represents:

1. On February 11, 2022, pursuant to 28 U.S.C. § 1781, the Trustee filed the Motion for the Issuance of Letter of Request for International Judicial Assistance to The Senior Master, for the attention of the Foreign Process Section, Room E16 of the Royal Courts of Justice, Strand, London WC2A 2LL, United Kingdom, for the examination of Mr. Jérôme Müller (Adv. Pro. No. 10-04330 (CGM) (Bankr. S.D.N.Y. Feb. 11, 2022), ECF 236).

2. The deadline to file an objection to the Motion expired on February 23, 2022. A hearing on the Motion has been scheduled for March 16, 2022 at 10:00 a.m.

3. Notice of the Motion was timely provided by email to defendants in the adversary proceeding and all parties that filed a notice of appearance in this case, pursuant to the Order Establishing Notice Procedures (Adv. Pro. No. 08-01789 (CGM) (Bankr. S.D.N.Y. Dec. 5, 2011), ECF No. 4560).

4. Counsel has reviewed the Court’s docket not less than forty-eight (48) hours after expiration of the time to file an objection, and to date, no objection, or responsive pleading with respect to the Motion appears thereon. Additionally, no party has indicated to the Trustee that it intends to oppose the relief requested in the Motion.

5. An electronic copy of the proposed order (the “Order”), that is substantially in the form of the proposed order that was annexed to the Motion will be submitted to the Court, along with this certificate.

6. Pursuant to Local Bankruptcy Rule 9075-2, the Trustee respectfully requests that the Order be entered without a hearing.

Dated: New York, New York
February 28, 2022

Respectfully submitted,

/s/ Marco Molina

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